#### IN THE DISTRICT COURT OF OKLAHOMA COUNTY FEB -3 2023 STATE OF OKLAHOMA

Oklahoma Department of Securities ex rel. Melanie Hall, Administrator,	) COURT CLERK ) 125
Plaintiff,	)
v.	) Case No. CJ-2022-5066
	) Judge Don Andrews
Premier Global Corporation, et al.	)
	)
Defendants.	)

# MOTION OF DEFENDANT RICHARD DALE DEAN TO SETTLE JOURNAL ENTRY

Defendant Richard Dale Dean respectfully requests that the Court settle a journal entry in this action and enter the order attached hereto as Exhibit 1. In support of this Motion, Mr. Dean states as follows:

- 1. On December 15, 2022, Mr. Dean filed an Emergency Motion for Partial Lifting of Asset Freeze to Permit Payment of Legal Fees and an Emergency Motion for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses ("the Motions").
- 2. On January 5, 2023, this Court held oral argument on the Motions. At the close of the hearing, the Court requested that Mr. Dean submit certain additional information to permit the Court to evaluate the Motions. The Court scheduled a follow-up hearing on January 11, 2023.
- 3. Mr. Dean submitted the additional information on January 9, 2023. Further, the Receiver submitted a proposal to the Court regarding several matters, including the Motions.
- 4. At the follow-up hearing on January 11, 2023, the Court indicated that it would grant the Motions in part. In particular, the Court approved the segregation of \$245,000 from a bank account owned by Mr. Dean to be used for Mr. Dean's legal expenses in defense of this lawsuit. The Court ordered that Crowe & Dunlevy ("C&D") submit monthly invoices to the Receiver and the Court. With consideration given to the Receiver's recommendation, the Court

would approve reasonable legal fees. The Court additionally indicated that fees incurred by Crowe & Dunlevy in assisting the Receiver with the Life Settlement LLCs could be separately reimbursed from the Receivership Estate.

- 5. As to living expenses, the Court authorized Mr. Dean to use up to \$20,000 from a bank account owned by Mr. Dean for living expenses consistent with the budget submitted to the Court. The Court indicated that it would re-evaluate the approval of living expenses after two months.
- 6. At the close of the hearing, the Receiver indicated that he would prepare a draft order and circulate it to the parties.
- 7. On January 23, 2023, the Receiver submitted the proposed draft attached hereto as Exhibit 2 ("Receiver's Proposal"). As the Receiver acknowledged in his email forwarding the draft, "not all topics in the Order were specifically discussed at the hearing."
- 8. In light of the fact that the Receiver's Proposal addressed several topics not included within the Court's rulings, Mr. Dean circulated to the parties a counter-proposal, attached hereto (with minor clarifications) as Exhibit 1 ("Dean's Proposal"). Although there are numerous minor differences between the Receiver's Proposal and Dean's Proposal, there are two significant and substantive differences that Mr. Dean would bring to the Court's attention:
  - The Receiver's Proposal provides that the \$245,000 segregated legal fund would also be used to pay Mr. Dean's taxes. Neither the Court nor the parties addressed payment of Mr. Dean's taxes at the hearing. Further, Mr. Dean's 2021 tax liability is over \$70,000. The Receiver's Proposal would thus reduce the funds available for Mr. Dean's legal fees by one-third. This is inconsistent with the Court's order that the Receiver set aside \$245,000 for Mr. Dean's reasonable legal fees.
  - The Receiver's Proposal provides that all funds in bank accounts owned or controlled by Mr. Dean be turned over to the Receiver. These bank accounts are all frozen (other than the specific amounts approved by the Court for legal fees and living expenses) and there is no danger that Mr. Dean can spend those funds. Mr. Dean expects that he will be exonerated through this lawsuit, however, and will be

entitled to the return of any funds that are unrelated to Premier Global. If his accounts are unfrozen and transferred to the Receivership Estate, Mr. Dean fears that the Receiver will use these untainted funds to pay the Receiver's legal fees to and that he will be unable to recover control of untainted and depleted funds at the conclusion of this lawsuit.

These concerns are exacerbated by the fact that Mr. Dean has recently learned that 9. the Receiver has entered into a "common interest agreement" with Plaintiff Oklahoma Department of Securities. See Exhibit 3 at 12/13/2022 time entry ("Review and confer with Department of Oklahoma Securities about common interest agreement"). The existence of such an agreement would indicate that the Receiver does not view himself as a "neutral" acting solely on behalf of the Court. Rather, a "common interest agreement" would reflect an understanding by and between the Receiver and Oklahoma Department of Securities that their legal interests are "identical." See, e.g., 10x Genomics, Inc. v. Celsee, Inc., 505 F.Supp.3d 334, 337 (D. Del. 2020) (holding that, for common interest doctrine to be applicable, the interests the parties claim to hold in common must be "identical, not similar, and legal"). Mr. Dean is understandably concerned that such an agreement indicates that the Receiver shares the Department's view that Mr. Dean has already been found guilty and the Court proceedings are simply intended to liquidate his assets. At a minimum, a common interest agreement between the Receiver and the Department would give rise to an appearance of bias against Mr. Dean and in favor of the Plaintiff Oklahoma Department of Securities.

WHEREFORE, Defendant Richard Dale Deal respectfully requests that the Court enter the proposed order attached hereto as Exhibit 1.

CERTIFIED COPY

Tara A. LaClair, OBA #21903AS FILED OF RECORD

Bruce W. Day, OBA #2238

Mary H. Tolbert, OBA #17353

FEB - 3 2023

RICK WARREN COURT CLERK County

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DALE DEAN AND DDI ADVISORY GROUP,
LLC

#### CERTIFICATE OF SERVICE

This certifies that on this 3<sup>rd</sup> day of February, 2023, a true and correct copy of the above and foregoing was delivered to:

Patricia A. Labarthe

(via E-Mail and First Class Mail)

Shaun Mullins

Oklahoma Department of Securities

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## IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

Oklahoma Department of Securities ex rel. Melanie Hall, Administrator,	) )
Plaintiff,	) )
v.	) )
Premier Global Corporation et al.,	, ) Case No. CJ-2022-5066
Defendants.	Judge Don Andrews
	)

# ORDER ON DEFENDANT RICHARD DALE DEAN AND DDI ADVISORY GROUP, LLC'S EMERGENCY MOTIONS FOR PARTIAL LIFTING OF ASSET FREEZE TO PERMIT PAYMENT OF LIVING EXPENSES AND FOR PARTIAL LIFTING OF ASSET FREEZE TO PERMIT PAYMENT OF LEGAL FEES

On the 11<sup>th</sup> day of January, 2023, the above-styled case came before the Court on the Emergency Motion of Defendant Richard Dale Dean ("Dean") for Partial Lifting of Asset Freeze for the Payment of Legal Fees ("the Attorney Fee Motion") and the Emergency Motion of Defendant Richard Dale Dean for Partial Lifting of Asset Freeze for the Payment of Living Expenses ("the Living Expense Motion"). The Court having reviewed the briefs, the Receiver's proposal, and upon hearing argument hereby implements the following interlocutory procedures and modifications with respect to the *Order Freezing Assets, Order Prohibiting Disposition of Assets and Order Prohibiting Destruction or Disposition of Records* dated October 14, 2022 (the "Freeze Order").

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Living Expense Motion and the Attorney Fee Motion are temporarily granted in part and denied in part as further set forth in this Order.

IT IS FURTHER ORDERED that the following compensation procedures shall be utilized



for the payment of legal fees and expenses incurred by Dean and DDI Advisory Group, LLC ("DDI," together with Dean the "Dean Defendants"):

- 1. From the funds held in Kanza Account ending #3907, the Receiver will transfer and cause to be segregated \$245,000.00 into an account maintained by the receivership estate (the "Segregated Legal Defense Fund") for legal fees and expenses incurred for the defense of the Dean Defendants after October 13, 2022. The Dean Defendants will apply to the Court when it is necessary to replenish the Segregated Legal Fund from funds that have been paid and will be paid to Mr. Dean from his interest in the life insurance proceeds of Mr. William L. McIntire and confirmed by the court in Settlements of Texas, Inc. v. Life Investors Mgmt. Co., LLC, Cause No. 342-307672-19 (Tarrant County, Texas).
- 2. For services performed from and after October 13, 2022, C&D shall separate and maintain separate billing statements for legal fees incurred for: (a) the Dean Defendants' defense (the "Dean Defense Fees"), and (b) legal fees incurred in assisting the Receiver with the Receivership Estate through, including but not limited to, reviewing the organizational documents, operating agreements and private placement memoranda underlying the Life Settlement LLC's currently managed by Mr. Dean or entities controlled by Mr. Dean, identifying any amendments to the Life Settlement LLC's that might be required, in conjunction with identifying and retaining a successor Administrator that is acceptable to Mr. Dean and the Receiver (the "Receivership Fees").
- 3. C&D may seek reimbursement for reasonable Dean Defense Fees pursuant to the following conditions ("Dean Defense Fees Procedures"):
  - a. C&D shall provide monthly fee and expense statements for payment from the Segregated Legal Defense Fund (the "Dean Defense Fees Monthly Statements") to the Court and the Receiver not later than the 10<sup>th</sup> day of each month, with the first fee statement due no later than February 10, 2023. It is envisioned that the first Monthly Statement will contain Dean Defense Fees and expenses from October 13, 2022, through January 31, 2023. Delivery to the Receiver shall be by electronic mail at <a href="mailto:pgcreceiver@spencerfane.com">pgcreceiver@spencerfane.com</a> with a copy to the Receiver's counsel of record.
  - b. C&D shall file with the Court and serve on the parties a notice of submission and certificate of service indicating that the Dean Defense Fees Monthly Statement has been delivered to the Court and the Receiver. The notice will not attach the Dean Defense Fees Monthly Statements, but will contain the total amount requested in fees and expenses.
  - c. The Receiver shall have five (5) business days from receipt of the Dean Defense Fees Monthly Statement to review and submit a recommendation to the Court if he believes any Dean Defense Fees Monthly Statement is

"excessive or unreasonable". The recommendation shall be submitted in camera to the Court copying C&D. C&D may request a brief in camera meeting with the Court and Receiver's counsel in the event the Receiver recommends the non-payment of some portion of the Dean Defense Fees Monthly Statement to resolve any dispute. If the Receiver recommends that the Dean Defense Fees Monthly Statement be approved, the Receiver is authorized and directed to promptly pay the Dean Defense Fees Monthly Statement from the Segregated Legal Fund.

- d. If C&D seeks reimbursement for fees and expenses for services that relate to taking action against the Receiver or in opposition to any other relief sought by the Receiver, then C&D may redact the narratives related to such activity to the extent they contain privileged communications. The unredacted billing statements shall be separately maintained and submitted directly to the Court for *in camera* review.
- 4. C&D may seek reimbursement for reasonable Receivership Fees pursuant to the following conditions ("Receivership Fees Procedures"):
  - a. C&D shall provide monthly fee and expense statements (the "Receivership Monthly Statements") to the Receiver by the 10th day of each month with the first monthly statement due on February 10, 2023. It is envisioned that the first Receivership Monthly Statement will contain Receivership Fees from October 13, 2022, through January 31, 2023. Delivery to the Receiver shall be by electronic mail at <a href="mailto:pgcreceiver@spencerfane.com">pgcreceiver@spencerfane.com</a> with a copy to the Receiver's counsel of record.
  - b. The Receiver shall receive unredacted versions of the Receivership Monthly Statements.
  - c. C&D shall file with the Court and serve on the Receiver a notice of submission and certificate of service indicating that the Receivership Monthly Statement has been delivered to the Reviewing Parties. The notice will not attach the Receivership Monthly Statements, but will contain the total amount requested in fees and expenses and that redacted billing statements are available upon request.
  - d. If the Receiver does not object in writing within five (5) business days of service, C&D's fees and expenses are directed to be paid from the Receivership Estate on a monthly basis on the following terms:
    - i. C&D's fees are directed to be paid on a monthly basis from the Receivership Estate (and not from the Segregated Legal Defense Fund);
    - ii. In the event there is an objection to a Receivership Monthly Statement, the Receiver is directed to pay the non-objectionable fees or expenses immediately. Objections to fees shall be particular to

the time entry or entries for which an objection is made, and for each, the basis for the objection. General objections to fees shall not prevent the payment under the compensation terms set forth herein, and may be raised, if and as appropriate, in response to an application for approval of fees and expenses.

IT IS FURTHER ORDERED that the following procedures shall be utilized for the payment of **Dean's personal living expenses**:

- 1. The asset freeze on Kanza Bank Account ending #3336 (the "Agency Account") will be lifted and Dean will be granted the use of funds up to \$20,000 for the personal expenses identified and budgeted in the Living Expense Motion up to and through March 11, 2023 (the "Budget");
- 2. Without prior approval of the Court or the express written consent of the Receiver or any other party, Dean may pay the actual and necessary budgeted expenses not to exceed, on a monthly basis, one hundred and ten percent (110%) of the amount stated for each category of expense in the Budget; provided, however, that in no event shall the total amount expended, on a monthly basis, exceed one hundred and ten (110%) of the total amount of expenses stated in the Budget without prior approval. If a certain Budget line item is not utilized in its budgeted month, then the unused portion of such line item shall be carried over to the subsequent month in the Budget.
- 3. Beginning on February 10, 2023, and on the tenth day of every alternate month that this Order is in effect, Dean shall provide a report to the Parties and the Court on actual income and expenses for the prior month along with the bank statements for that month related to the Agency Account

THE HONORABLE DON ANDREWS JUDGE OF THE DISTRICT COURT

# IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

Oklahoma Department of Securities ex rel. Melanie Hall, Administrator,	) )	
Plaintiff,	, ) )	
v.	, ) )	
Premier Global Corporation et al.,	) ) Case No. CJ-2022-5066	EXHIBIT
Defendants.	) Judge Don Andrews )	rappier 2
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#### ORDER ON DEFENDANT RICHARD DALE DEAN AND DDI ADVISORY GROUP, LLC'S EMERGENCY MOTIONS FOR PARTIAL LIFTING OF ASSET FREEZE TO PERMIT PAYMENT OF LIVING EXPENSES AND FOR PARTIAL LIFTING OF ASSET FREEZE TO PERMIT PAYMENT OF LEGAL FEES

On the 11th day of January, 2023, Defendant Richard Dale Dean ("Dean") and DDI Advisory Group, LLC's ("DDI", together with Dean, the "Dean Defendants") Emergency Motion for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses (the "Living Expense Motion") and the Dean Defendants' Emergency Motion for Partial Lifting of Asset Freeze to Permit Payment of Legal Fees (the "Attorney Fee Motion") came before the undersigned Judge of the District Court. Plaintiff appeared by and through its counsel of record, Patty Labarthe, Shaun Mullins and Brad Davenport of the Oklahoma Department of Securities ("Plaintiff"), the Dean Defendants appeared by and through their counsel of record, Bruce Day, Molly Tolbert and Tara LaClair of Crowe & Dunlevy ("CAD"), and the Receiver Eric Johnson (the "Receiver") appeared with his counsel of record, Hilary S. Allen of Spencer Fane, LLP. The Court having reviewed the briefs, the Receiver's proposal, and upon hearing argument hereby implements the following interlocutory procedures and modifications with respect to the *Order Freezing Assets, Order Prohibiting Disposition of Assets and Order Prohibiting Destruction or Disposition of Records* 

dated October 14, 2022 (the "Freeze Order").

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Living Expense Motion and the Attorney Fee Motion are temporarily granted, in part, and denied, in part as further set forth in this Order.

IT IS FURTHER ORDERED that, within seven (7) days of entry of this Order, Kanza Bank will turn over to the Receiver the funds in the following accounts (the "Receivership Accounts"):

Account Title	Acct Last	Owner	Amount
	4 Digits	n'shand Dane	\$7,404.74
Richard Dale Dean; Dickie Deans Insurance &	6800	Richard Dean	\$7,404.74
Investment Agency, Inc.			0.000.000.10
Richard Dale Dean (consumer savings)	3907	Richard Dean	\$672,372.10
DDI Advisory Group LLC; Dickie Deans	3352	DDI Advisory Group LLC	\$15,741.99
Insurance & Investment Agency Inc.			
DDI Advisory Group LLC Account B; Dickie	3662	DDI Advisory Group LLC	\$5,914.52
Deans Insurance & Investment Agency Inc			
KCI Business Services LLC	4960	KCI Business Services LLC	\$950.16
PF-2 LLC	1497	PF-2 LLC	\$3,091.63
PF-6 LLC	1535	PF-6 LLC	\$846.58
PF-4 LLC	2027	PF-4 LLC	\$546.82
PF-5 LLC	2035	PF-5 LLC	\$268.87
Premier Factoring LLC	2043	Premier Factoring LLC	\$1,707.22
PF-3 LLC	2051	PF-3 LLC	\$251.17
PF-7 LLC	2078	PF-7 LLC	\$334.39
Premier Factoring Group LLC	2205	Premier Factoring Group LLC	\$41,252.14
Premier Global Corporation	5037	Premier Global Corporation	\$1,159.61

Such turnover is without prejudice to Kanza making application to this Court for any applicable fees associated with the Receivership Accounts.

IT IS FURTHER ORDERED that the following accounts shall remain frozen except as provided in this Order, the Agreed Order dated January 3, 2023, or as may be provided in further Orders of the Court:

Account Title	Acct Last 4 Digits	Owner	Amount
Settlements of Texas Inc.; Dickie Deans Insurance & Investment Agency Inc.	3301	Settlements of Texas Inc.	\$1,242.53

Wealth & Retirement Solutions LLC; Dickie	3328	Wealth & Retirement Solutions LLC	\$677.15
Deans Insurance & Investment Agency Inc.			455 455 64
Dickie Dean Insurance & Investment Agency	3336	Dickie Deans Insurance & Investment	\$58,372.84
Inc.		Agency Inc	
B D &R LLP; Dickie Deans Insurance &	3379	BD&RLLP	\$723.41
Investment Agency, Inc.			0.17.550.50
Merritt Missouri LLC; Dickie Deans	3468	Merritt Missouri LLC	\$45,579.70
Insurance & Investment Agency Inc			40.760.61
Adams Missouri LLC; Dickie Deans	3476	Adams Missouri LLC	\$3,763.61
Insurance & Investment Agency Inc			40.005.02
H T Long LLC; Dickie Deans Insurance &	3670	H T Long LLC	\$9,805.92
Investment Agency Inc			010.050.00
NJ Stephen Interest Three LLC; Dickie	3689	NJ Stephen Interest Three LLC	\$18,253.20
Deans Insurance & Investment Agency Inc			01400701
Wood Missouri LLC; Dickie Deans	3719	Wood Missouri LLC	\$14,297.01
Insurance & Investment Agency Inc			00401070
SHAH-H1 LLC	4073	SHAH-H1 LLC	\$24,818.78
SHAH-P1 LLC	4081	SHAH-P1 LLC	\$8,363.89
SHAH-P2 LLC	4111	SHAH-P2 LLC	\$6,732.24
SHAH-H2 LLC	4138	SHAH-H2 LLC	\$13,587.41
SHAH-P3 LLC	4189	SHAH-P3 LLC	\$14,439.17
DAVIS 1 LLC	4219	DAVIS 1 LLC	\$58,658.23
DAVIS 2 LLC	4294	DAVIS 2 LLC	\$52,339.26
GOLDMAN I LLC	4316	GOLDMAN 1 LLC	\$23,213.92
DIANE DAVIS POLICY LLC	4545	DIANE DAVIS POLICY LLC	\$34,177.51
SHAH POLICY LLC	4561	SHAH POLICY LLC	\$2,033.64
DAVIS 3 LLC	4596	DAVIS 3 LLC	\$4,832.97
GOLDMAN POLICY LLC	4618	GOLDMAN POLICY LLC	\$3,565.93
ESIENBERG POLICY LLC	4715	ESIENBERG POLICY LLC	\$8,2391.98
ALTERNATIVE INDEMNITY	4839	ALTERNATIVE INDEMNITY	\$71,154.62
REINSURANCE COMPANY LTD		REINSURANCE COMPANY LTD	
HARILALL POLICY LLC	4847	HARILALL POLICY LLC	\$62,488.09
DDCW LLC	4855	DDCW LLC	\$5,004.43
AAA Management and Benefit LLC; Dickie	1004	AAA Management and Benefit LLC;	\$1,466.11
Deans Insurance & Investment Agency Inc	,	Dickie Deans Insurance & Investment	
Donne montaneo es misserment - Panel me		Agency Inc	
Premier Global Properties LLC	5053	Premier Global Properties LLC	\$6,843.29
TOI LLC	1462	TOILLC	\$2,218.79

IT IS FURTHER ORDERED that the following compensation procedures shall be utilized for the payment of the Dean Defendants' legal fees and expenses:

1. From the funds originally transferred from Kanza Account ending #3907, the Receiver will further segregate \$245,000.00 into a separate account maintained by the receivership estate (the "Segregated Legal Fund") for fees and expenses incurred after October 13, 2022. The Receiver will not be required, absent Order of the Court, to replenish the Segregated Legal Fund with other receivership estate funds or recoveries. Further, the Receiver may use the funds in the Segregated Legal Fund to pay for Dean and Dean related entities tax obligations. The Receiver shall seek guidance and further Court order to the extent he intends to use the funds other than to pay legal fees and expenses, or tax obligations.

- 2. For services performed from and after October 13, 2022, CAD shall separate and maintain separate billing statements for services performed for the Dean Defendants' defense (the "Personal Fees"), and for the services performed in assistance to the Receiver and the Receivership Estates (the "Receivership Fees").
- 3. CAD may seek reimbursement for reasonable Personal Fees pursuant to the following conditions ("Personal Fees Procedures"):
  - a. CAD shall provide monthly fee and expense statements (the "Personal Monthly Statements") to the Court and the Receiver by the 10<sup>th</sup> day of each month with the first fee statement due on February 10, 2023. It is envisioned that the first Monthly Statement will contain fees and expenses from October 13, 2022 through January 31, 2023. Delivery to the Receiver shall be by electronic mail at <a href="mailto:pgcreceiver@spencerfane.com">pgcreceiver@spencerfane.com</a> with a copy to the Receiver's counsel of record.
  - b. CAD shall file with the Court and serve on the parties a notice of submission and certificate of service indicating that the Personal Monthly Statement has been delivered to the Court and the Receiver. The notice will not attach the Personal Monthly Statements, but will contain the total amount requested in fees and expenses.
  - C. The Receiver shall have ten (10) business days from receipt of the Personal Monthly Statement to review and submit a recommendation to the Court as to the allowance of the requested fees. The recommendation shall be submitted *in camera* to the Court copying CAD. As part of the recommendation, the Receiver shall submit a proposed order authorizing the payment of the recommended fees ("Monthly Fee Order"). Upon entry of and pursuant to the terms of the Monthly Fee Order, the Receiver is authorized to pay the Personal Fee Expenses from the Segregated Legal Fund.
  - d. If CAD seeks reimbursement for fees and expenses for services that relate to taking action against the Receiver or in opposition to relief sought by the Receiver, then CAD may redact the narratives related to such activity to the extent they contain privileged communications. The unredacted billing statements shall be separately maintained and submitted directly to the Court for *in camera* review.
  - e. The Monthly Fee Order(s) remains interlocutory and subject to revision and modification until such time as the Personal Fees are approved on a final basis.
- 4. CAD may seek reimbursement for reasonable Receivership Fees pursuant to the following conditions ("Receivership Fees Procedures"):
  - a. CAD shall provide the Receiver a proposed budget for Receivership Fees for the period starting February 1, 2023;

- b. CAD shall provide monthly fee and expense statements (the "Receivership Monthly Statements") to the Receiver and the Plaintiff (the "Reviewing Parties") by the 10th day of each month with the first monthly statement due on February 10, 2023. It is envisioned that the first Receivership Monthly Statement will contain Receivership Fees from October 13, 2022 through January 31, 2023. Delivery to the Receiver shall be by electronic mail at <a href="mailto:pgcreceiver@spencerfane.com">pgcreceiver@spencerfane.com</a> with a copy to the Receiver's counsel of record.
- c. CAD may redact its narratives on the Receivership Monthly Statements to the extent it is covered by attorney client, work product, or other applicable privilege; <u>provided</u>, <u>however</u>, the Receiver shall receive unredacted versions of the Receivership Monthly Statements.
- d. CAD shall file with the Court and serve on the parties a notice of submission and certificate of service indicating that the Receivership Monthly Statement has been delivered to the Reviewing Parties. The notice will not attach the Receivership Monthly Statements, but will contain the total amount requested in fees and expenses and that redacted billing statements are available upon request.
- e. If none of the Reviewing Parties object in writing within ten (10) business days of service, CAD's fees and expenses are authorized to be paid on a monthly basis on the following terms:
  - i. 100% percent of an CAD's fees are authorized to be paid on a monthly basis and, subject to the 20% Holdback (as defined below), CAD may apply said amount to outstanding invoices for services; provided, however, that CAD shall retain 20% of said monthly fee in its attorney trust account (the "20% Holdback") pending further order of this Court.
  - ii. In the event there is an objection to a Receivership Monthly Statement, the Receiver is authorized pursuant to the procedures set forth herein to pay the non-objectionable fees or expenses. Objections to fees shall be particular to the time entry or entries for which an objection is made, and for each, the basis for the objection. General objections to fees shall not prevent the payment under the compensation terms set forth herein, and may be raised, if and as appropriate, in response to an application for approval of fees and expenses.
  - iii. CAD's expenses shall be reimbursed in full on a monthly basis, subject to disgorgement if disallowed at the time CAD's periodic fee application is made herein.
  - iv. CAD shall file periodic fee applications at approximately 120-day

intervals with the first such periodic fee application due on February 15, 2023 and every 120 days thereafter unless modified by Court Order. Upon approval of the periodic fee application, CAD may apply the 20% Holdback to outstanding invoices for post-October 13 services. Failure to timely object to a Receivership Monthly Statement does not waive any objection to a periodic fee application.

- v. The orders approving the quarterly fee applications (the "Quarterly Orders") remain interlocutory and subject to revision and modification until such time as the Receivership Fees are approved on a final basis.
- Notwithstanding the procedures set forth in this Order, if, the Receiver in his reasonable business judgment and considering the need to maintain adequate and necessary reserves, determines there are insufficient funds to cover the tax obligations related to Dean and Dean-related entities for which the Receiver, the receivership estates, or any related qualified settlement fund may be obligated to pay, the Receiver may freeze or discontinue any required payment hereunder until a sufficient reserve has been established in order to pay such taxes. Until the Personal Fees and Receivership Fees have been approved on a final basis, all fees paid pursuant to these procedures remain subject to adjustment and/or disgorgement.

IT IS FURTHER ORDERED that the following procedures shall be utilized for the payment of Dean's personal living expenses:

- 1. The asset freeze on Kanza Bank Account ending #3336 (the "Agency Account") will be partially lifted and Dean will be granted the use of funds up to \$20,000 for the personal expenses identified and budgeted in the Living Expense Motion up to and through March 11, 2023 (the "Budget");
- 2. Without prior approval of the Court or the express written consent of the Receiver and State Agency, Dean may pay the actual and necessary budget expenses not to exceed, on a monthly basis, one hundred and ten percent (110%) of the amount stated for each category of expense in the Budget; provided, however, that in no event shall the total amount expended, on a monthly basis, exceed one hundred and ten (110%) of the total amount of expenses stated in the Budget without prior approval. If a certain Budget line item is not utilized in its budgeted month, then the unused portion of such line item shall be carried over to the subsequent month in the Budget.
- 3. Beginning on February 10, 2023, and on the tenth day of each month this Order is in effect, Dean shall provide a report, in mutually agreeable form, to the Parties and the Court on actual income and expenses for the prior month along with the bank statements for that month related to the Agency Account. Dean consents to the Receiver obtaining the bank statements directly from Kanza Bank in order to verify

information.

- 4. The Receiver will not be required to replenish the Agency Account with other receivership estate funds and recoveries.
- 5. This Order is without prejudice and all rights of the Receiver and Plaintiff are reserved regarding Dickie Deans Insurance & Investment Agency Inc. (the "Agency") including, without limitation, (a) whether the Agency should be determined to be a receivership entity; and (b) seeking turnover of any monies in the Agency Account or other accounts at Kanza or other financial institutions.

IT IS FURTHER ORDERED that the modifications to the asset freeze related to the Dean Defendants including, without limitation, the payment of legal fees and living expenses as allowed by this Court are conditioned upon the full cooperation of the Dean Defendants with the Receiver including, without limitation, the following:

- 1. By no later than January 31, 2023, the Dean Defendants shall: (a) provide copies of all errors and omissions and /or general liability insurance policies held by Dean individually or by any entity owned or controlled by him; (b) provide an accounting and explanation of the use of Mr. Dean's home equity line of credit for the past twelve (12) months; (c) provide the completed form DA; (c) provide and attest a complete response to the request for information related to the Life Settlement Policies provided by Receiver's counsel on November 23, 2022; and (d) identify the e-mail accounts used by the Dean Defendants and any other e-mail accounts used by him/it, along with passwords to access such e-mail accounts;
- 2. By no later than February 10, 2023, the Dean Defendants shall provide and attest an accounting of all money paid to the Dean Defendants or entities owned or controlled by any of the Premier Defendants as defined by the Petition filed in this matter;
- 3. The Dean Defendants shall cooperate to have a new life settlement administrator in place; and
- 4. Promptly provide such additional information requested by the Receiver in performance of his duties as a Receiver.

The Court will review the status of Dean Defendants' cooperation in determining whether the temporary modifications to the Freeze Order will remain in place.

IT IS FURTHER ORDERED that with respect to Dean's property interests in Belize that:

1. The Receiver is authorized to transfer from the funds originally transferred from Kanza Account ending #3907, the amount of \$3,079.82 to the Premier Global

Corporation Receivership Account as reimbursement for payments advanced to maintain certain Dean owned units at the X'Tan Ha Resort in Belize;

2. On an ongoing basis, the Receiver is authorized to pay from the funds originally transferred from Kanza Account ending 3907 all expenses related to Dean's property interests in Belize including, without limitation, expenses related to the X'Tan Ha Resort; and

3. The Receiver may access, inspect, and inventory the contents of Dean's X'Tan Ha units, whether in person, through a designated agent, or virtually.

IT IS FURTHER ORDERED that the modifications to the Freeze Order set forth herein only apply to the Dean Defendants, are temporary in nature, and will expire on March 11, 2023 at 11:59 p.m. (CST) unless further extended by the Court.

IT IS FURTHER ORDERED that for cause shown and upon notice and hearing, the Receiver and the State Agencies may seek to immediately suspend modifications and seek full reinstatement of the Freeze Order.

JUDGE OF THE DISTRICT COURT

APPROVED AS TO FORM:

Hilary Allen, OBA No. 16979 SPENCER FANE LLP 9400 N. Broadway Extension, Ste. 600 Oklahoma City, Oklahoma 73114 Phone: 405-844-9900

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## IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

Oklahoma Department of Securities ex rel. Melanie Hall, Administrator,	)
Plaintiff,	)
v.	)
Premier Global Corporation et al.,	) Case No. CJ-2022-5066
Defendants.	) Judge Don Andrews

#### MONTHLY STATEMENT OF PROFESSIONAL FEES AND EXPENSES

Pursuant to the Order Appointing Receiver (the "Receivership Order"), Eric L. Johnson, Receiver ("Receiver"), by and through counsel, submits this Monthly Statement of Professional Fees and Expenses (the "Monthly Statement"). A redacted copy of the Receiver's and Spencer Fane's detailed billing statements (the "Monthly Billing Statements") are attached hereto as **Exhibit 1**.

You are hereby notified that if no written objection to the Monthly Billing Statements is made to the Receiver, by <u>February 15, 2023</u>, the Receiver is authorized, but not directed, to make the following payments:

Period	Professional	80% Fees	80% Fees 20%	
			Holdback	
12/1/22-12/31/22	Eric L. Johnson, Rec.	\$39,460.00	\$9,865.00	\$0.00
12/1/22-12/31/22	Spencer Fane LLP	\$103,635.20	\$25,908.80	\$19,832.44

Pursuant to the Receivership Order, (1) any objection to fees in the Monthly Billing Statements must be particular to the time entry or entries for which an objection is made; (2) general objections to fees shall not prevent the payment under the compensation terms set forth in the Receivership Order; and (3) failure to object to this Monthly Statement does not waive any objection to a periodic fee application. Further, until such periodic fee application has been approved by the Court, all paid fees and expenses remain subject to disgorgement.

Date: January 31, 2023

Respectfully submitted,

/s/ Eric L. Johnson, Receiver
Eric L. Johnson, Receiver
1000 Walnut St., Suite 1400
Kansas City, MO 64106
816-292-8267
ejohnson@spencerfane.com

<sup>&</sup>lt;sup>1</sup> With respect to expenses, Spencer Fane and the Receiver have voluntarily capped certain expenses. Specifically, expenses for meal and lodging reimbursement are capped at the GSA per diem rates for Sedgwick County, KS, which are substantially similar to the GSA per diem rates for Oklahoma City, Oklahoma. Spencer Fane and the Receiver have, in certain instances, also capped the total amount spent on airfare to \$750.00.



## Spencer Fane

Phone 816.474.8100 Federal ID # 44-0561981

Eric L. Johnson, Receiver 1000 Walnut Street, Suite 1400 Kansas City, MO 64118

INVOICE NO.: INVOICE DATE: CLIENT NO.: BILL ID:

#### **BILLING SUMMARY**

#### **CURRENT INVOICE**

**Total Legal Fees Total Disbursements** 

19,823.44

**Current Total** 

198,692.44

178,869.00

#### Premier Global Corporation, et al. Category Summary

Page 1 Invoice No. 1166568

Category		Hours	Amount
Receiver Time		104.80	49,325.00
Asset Analysis and Recovery		168.00	73,862.00
Asset Disposition		18.70	8,754.50
Business Operations		15.10	6,437.50
Case Administration		38.50	14,920.00
Employment and Fee Applications		5.40	2,664.00
Litigation: Contested Matters and Ancillary Proceedings		31.50	14,902.00
Tax		1.20	564.00
Non-Working Travel		34.70	7,440.00
	Total	417.90	178,869.00

#### Premier Global Corporation, et al. Time and Fee Summary

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Timekeeper	Initials	Rate	Hours	Fees	<b>Standard Rate</b>
Hillary S. Allen	HAS	500.00	3.30	1,650.00	575.00
Andrea M. Chase	AMC	235.00	6.50	1,527.50	470.00
Andrea M. Chase	AMC	470.00	15.90	7,473.00	470.00
Eric L. Johnson	ELJ	250.00	15.70	3,925.00	620.00
Eric L. Johnson	ELJ	500.00	90.80	45,400.00	620.00
Elizabeth M. Lally	EML	395.00	47.40	18,723.00	395.00
James A. Lodoen	JAL	500.00	52.70	26,350.00	695.00
Peter L. Riggs	PLR	250.00	6.00	1,500.00	535.00
Peter L. Riggs	PLR	500.00	51.10	25,550.00	535.00
Lindsay J. Doman	LID	320.00	14.30	4,576.00	345.00
Emily N. Reed	ENR	320.00	3.50	1,120.00	320.00
Vincent J. Aiello	VJA	500.00	4.80	2,400.00	545.00
Eric C. Peterson	ECP	250.00	15.70	3,925.00	585.00
Eric C. Peterson	ECP	500.00	60.70	30,350.00	585.00
Linda K. Williams	LKW	365.00	0.50	182.50	365.00
Pamela S. Ozias	PSO	175.00	6.20	1,085.00	280.00
Karen Johnson	KJ	150.00	5.10	765.00	190.00
Felecia A. Morris	FAM	75.00	6.50	487.50	190.00
Felecia A. Morris	FAM	150.00	10.40	1,560.00	190.00
Tyler Burger	ТВ	240.00	0.80	192.00	240.00
Jodi R. Peretz	JRP	75.00	1.70	127.50	220.00
	Totals		419.60	178,869.00	

#### Premier Global Corporation, et al. Receiver Time

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Date	Tkpr		Hours	Rate	Bill Amount
12/1/2022 12/1/2022	EU	Travel from Belize City to X-Tan Ha for property inspection.  Attention to Receivership matters including the following: (1) follow up and secure payment to maintain health insurance through December 31, 2022; (2) attention to 2021 Lexus including registration and value to the estate; (3) review liquidation efforts related to various items of personal property; (3) review correspondence and respond from various financial institutions related to receivership entities; (4) review and comment on response from various entities potentially maintaining information related to the receivership including accountant and cloud services; (5) review response from one of the crypto currency exchanges showing balance of crypto currency; and (6) evaluation and outline various action items related to assets located in Belize.	1.70 7.20	250.00 500.00	425.00 3,600.00
12/2/2022	EU	Attention to receivership matters including (1) continued inspection of Belize property interests including large amount of land for the planned Parish Belize home; (2) meeting with X'Tan HOA president, management company, and concerned HOA members regarding receivership and impact on property; (3) review and authorize maintaining certain insurance; (4) confer with counsel regarding various items; (5) attention to Derby inspection and follow up with Ms. Morris regarding the same and other logistical items; (6) outline various liquidation initiatives and next steps; and (7) meet Mike Coleman and Saul and Sam Bolanos to discuss current situation and circumstances.	10.30	500.00	5,150.00
12/3/2022	EU	Attention to receivership matters including (1) inspection of various units including further inspection of Unit 19 (Parish Unit); (2) follow-up meeting with Mary Dalquist related to receivership units and status; (3) receive update related to various Belize issues and circumstances; (4) receive update status report regarding various other assets of estate including Las Vegas assets and bank accounts; and (5) summarize and prepare daily notes from inspection.	8.30	500.00	4,150.00
12/4/2022	EN	Travel from X'Tan Ha to Belize City; Travel from Belize City to Houston, TX; Travel from Houston, TX to Kansas City, Mo.	14.00	250.00	3,500.00
12/4/2022	EN	Attention to receivership matters including (1) meet with Jill Alt, HOA president for wrap-up meeting; (2) final inspection of Parish unit and Unit 4c; (3) final wrap up with Mary Dalquist, with management company, as final wrap up; (4) documentation of various items recovered from various premises; and (5) summarize and prepare daily notes from inspection.	3.70	500.00	1,850.00
12/5/2022	EU	Attention to Receivership matters including (1) review notes and follow up from Belize trip including communicate with property management company about payments to be made; (2) review status update related to Las Vegas assets including liquor, Bentley, and tickets; (3) follow up regarding status of intrust suite; (4) attention to 1016 Derby property inventory; (5) follow up regarding access to PO Box and forward of mail; (6) receive status update related to life settlement assets; and (7) receive status update related to access to Quickbooks and (8) other electronic cloud services.	4.40	500.00	2,200.00
12/6/2022	εΠ	Attention to receivership matters including (1) review, approve, and disburse funds to bring current X'Tan Ha insurance, taxes, plan payments, and HOA dues and confer with Ms. Dalhquist regarding same; (2) follow up on insurance related to 1016 Summerchase including amount of coverage on real and personal property; (3) attention to insurance related to certain vehicles on American Family policy and switch over to new provider; (4) report on inspection from 1016 Summerchase; (4) confer with counsel regarding search of potential assets; (5) attention to document preservation letters; (6) deposit of account proceeds related to Carson Bank; and (7) attention to various post-receivership expenses and mail.	3.30	500.00	1,650.00

#### Premier Global Corporation, et al. Receiver Time

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12/7/2022	EN	Review and comment on Richard Dean request regarding asset freeze; Follow up call with Mr. LaBarth regarding Dean Request and provide update on Belize asset inspection; work with counsel regarding installation of enhanced security protocols on 1016 Summerchase; follow up regarding insurance items.	2.20	500.00	1,100.00
12/8/2022	EU	Follow up on certain Belize matters including contact with persons of interest.	0.20	500.00	100.00
12/9/2022	EΠ	Follow up on message from investor party; attention to administrative matters including monthly reports and notice.	0.40	500.00	200.00
12/12/2022	EΠ	Review current status and emails related to Belize property and discuss with counsel next steps related to the same; identify possible liquidation avenues related to Allegiant tickets and receive update from counsel regarding sale efforts; review and direct next steps related to Bentley in Las Vegas; follow up regarding valuation of 2021 leased Lexus and update related to insurance on automobiles; receive update on life settlement policies and current efforts to get more information; receive report and give direction related to consolidation of bank accounts; confirm with counsel regarding mail forward; provide direction related to remaining electronic equipment; attention to potential witness interviews and timing related to the same; confer with counsel regarding ongoing health insurance and notice of termination.	3.30	500.00	1,650.00
12/13/2022	EN	(Review and confer with Department of Oklahoma Securities about common interest) (agreement and provide brief update and time line; begin bill payment process related to certain key preservation expenses; review and confer with counsel regarding use of Allegiant Tickets and follow up regarding the same.	1.20	500.00	600.00
12/14/2022	EIJ	Attention to disposition of Raiders tickets; review various preservation expenses and establish check request procedures.	1.20	500.00	600.00
12/15/2022	ELJ	Work on Monthly Billing Statement and Preparation of Billing Invoices.	3.20	500.00	1,600.00
12/15/2022	ELJ	Review professional billing statements; review, approve, and execute weekly checks for various administrative and preservation expenses; attention to issues related to Raiders tickets and disposition of the same.	1.90	500.00	950.00
12/16/2022	EM	Review emails and outline next steps related to transfer of raider tickets and follow up on tickets distributed without authorization; review professional billing statements and circulate monthly statements to counsel; work on monthly operating report for November; follow up on status related to bank account consolidation; attention to 1016 Summerchase utilities and maintenance bills	3.90	500.00	1,950.00
12/17/2022	ELJ	Review and revise first monthly operating report including review of identified assets and Quickbooks data.	1.60	500.00	800.00
12/18/2022	EЦ	Work on monthly operating report and inventory; follow up regarding insurance matters.	1.80	500.00	900.00
12/19/2022 12/20/2022	EN	Work on updating inventory for first operating report; Review status and provide guidance to counsel regarding Bentley; follow up regarding consolidation of bank accounts and opening receiving accounts; review asset searches by Richard Dean and DDI Investment as part of inventory process; work on initial monthly operating report and complete initial inventory listing of all receivership entities; reconcile all receivership acccounts; attention to preservation matters related to 1016 and payment of various expenses.	3.60 7.80	500.00 500.00	1,800.00 3,900.00
12/21/2022	EΠ	Review weekly expense requests and execute checks related to the same; Attention to monthly reporting and service list regarding same; Review and analysis related to continued healthcare coverage and dental payment; attention to Richard Dean filings and follow up with counsel regarding same.	1.30	500.00	650.00
12/22/2022	EI	Review correspondence related to life settlements and follow up regarding the same; attention to towing and titling Bentley located in Las Vegas.	0.60	500.00	300.00

#### Premier Global Corporation, et al. Receiver Time

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12/23/2022	ELJ	Attention and analysis related to life settlements including conference call with Oklahoma and Kansas Departments of Securities; Coordinate filing of final report in various jurisdictions; Attention to Raiders tickets and opening up transfer account; review and begin formulation of a propose related to asset freeze as it relates to Mr. Dean's legal fees and living expenses; review and execute check related to storage; review and approve health insurance benefit termination.	4.40	500.00	2,200.00
12/26/2022	ELJ	Prepare follow-up detailed report for Securities Agencies related to assets in Belize; attention to life settlements and identify various payments to be made; begin review of X'Tan Ha January payments in preparation of payment of the same; correspond with HOA president about upcoming HOA meeting; attention to requested Richard Dean expenses and to lift freeze; review status of Bentley in Las Vegas and costs to store and tow the same.	3.40	500.00	1,700.00
12/27/2022	ξIJ	Begin review related to quarterly X'Tan Ha property payments; review and follow up on capital call payments related to Life Settlement assets; review status of various receivership assets and investigations with counsel and progress regarding the same; review various correspondence and drafts related to unfreezing of certain accounts related to Life Settlements.	2.40	500.00	1,200.00
12/28/2022	EN	Review and revise receiver proposal to Dean Defendants related to frozen account assets; attention to various X'Tan Ha/Belize matters including review of payments, required maintenance, and follow up related to certain personal property; review status of various items related to life settlements; outline timing of various administrative expenses related to preservation of 1016 Summerchase property; review incoming mail from Premier Capital; follow up regarding ancillary proceeding in Nevada.	5.30	500.00	2,650.00
12/29/2022	EU	Review and revise receiver proposal related to Dean Defendants; attention to various banking matters related to the receivership estates including call with East West Bank.	0.70	500.00	350.00
12/30/2022	EU	Attention to Dean request for attorney fees and expenses including review and revised response to the Dean Defendant Motions; confer with Leif Larsen regarding various tax planning and tasks for upcoming year; return telephone call to investors tax advisor; review X'Tan Ha Unit 22 Q1 HOA and coordinate payment of the same; execute and send termination of dental insurance plan.	2.90	500.00	1,450.00
12/31/2022	EΠ	Attention to security related to 1016 Summerchase Drive.  Hours:	0.30 <b>104.80</b>	500.00 Amount:	150.00 <b>49,325.00</b>

#### Premier Global Corporation, et al. Asset Analysis and Recovery

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Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/1/2022	AMC	Phone call with P. Riggs and J. Lodoen regarding response to tip regarding party by L. Parish (.5); phone call with E. Johnson, E. Peterson, P. Riggs, and J. Lodoen regarding response to tip regarding Parish home (1.1); draft proposed e-mail to L. Parish's counsel regarding outstanding issues (.4).	1.90	470.00	893.00
12/1/2022	ECP	Correspondence with resort management, prepare for meeting and tour and meeting and tour of receivership resort units and related discussions and follow up with receiver.	2.30	500.00	1,150.00
12/1/2022	ECP	Correspondence with contractor regarding tour of lagoon side property.	0.30	500.00	150.00
12/1/2022	ECP	Attention to collection and storage of Bentley vehicle in Las Vegas.	0.20	500.00	100.00
12/1/2022	ECP	Conferences with receiver regarding unit inventory, access to personal parish units, collection of materials, documents, data and information, and discussions with HOA members and executive personnel.	2.20	500.00	1,100.00
12/1/2022	EML	Continue drafting custodian list for preservation letters, updating with additional counsel for parties to Okłahoma action as well as other potential custodians of records.	1,20	395.00	474.00
12/1/2022	ENR	Attention to strategy issues regarding reviewing and compiling relevant account receivable documents.	0.20	320.00	64.00
12/1/2022	JAL.	Conference with internal team to discuss Belize, Parish home and related asset concerns (1.0); call with A. Chase and P. Riggs to discuss Parish home and asset concerns (.5); meetings with L. Doman to discuss structure of subcontracts and to direct review of information regarding outstanding invoices (.7).	2.20	500.00	1,100.00
12/1/2022	PLR	Attention to strategy regarding potential witness (.6); conference with E. Johnson and team regarding Belize issues and eventual transfer of possession of Parish home and follow up correspondence as to the same (1.4); and follow up on scanning project and cell phone data (.2).	2.20	500.00	1,100.00
12/2/2022	ECP	Prepare for and participate in meeting with contractor and tour of lagoon side real property, related discussions with on-site personnel and collection of documents and plans located on site.	4.30	500.00	2,150.00
12/2/2022	ECP	Prepare for and participate in group meeting with HOA management and membership on site and relate discussions and follow up.	1.40	500.00	700.00
12/2/2022	ECP	Inspect units including Parish personal unit, attention to safe access, condition of premises, and search for documents and materials including keys.	0.80	500.00	400.00
12/2/2022	ECP	Prepare for meetings with local Parish assistant and meeting setup.	0.50	500.00	250.00
12/2/2022	ECP	Discussions with receiver regarding plans, information gathering, and approach to security, liquidation of estate assets.	1.50	500.00	750.00
12/2/2022	ECP	Further inspection of Parish unit.	0.60	500.00	300.00
12/2/2022	EML	Correspondence with Carson Bank regarding document preservation letter and service of the same.	0.10	395.00	39.50
12/2/2022	EML	Correspondence with Receiver, E. Johnson regarding requested update as to turnover of funds and status of preservation letters.	0.20	395.00	79.00
12/2/2022	JAL	Review stadium contract, internet research regarding assignment, and reach out to marketing/sales firm (2.3); calls with attorney, V. Alello to Identify contacts and to also discuss disposition of liquor located in Las Vegas Condo (.4); and correspondence regarding property in Parish home and insurance policies (.4).	3.10	500.00	1,550.00
12/2/2022	PLR	Work on issues surrounding Parish house and disposition of same.	0.50	500.00	250.00
12/2/2022 12/3/2022	PLR ECP	Review materials related to insurance policies for potential recovery.  Prepare for meetings and meetings in San Pedro, Belize with US Warden and Remax agent Jeff Bella, meeting with Harmouch hardware, meeting with Saul "Flacco" and inspect Tackle Box dock, X Cite excursion vessels which may potentially be the proceeds of Premier Global finding, return and prepare memo to receiver and team regarding same.	1.30 7.80	500.00 500.00	650.00 3,900.00
12/3/2022	ECP	Inspect Parish individual condo and go through shred, boxed and bagged items and other matters.	0.80	500.00	400.00

#### Premier Global Corporation, et al. Asset Analysis and Recovery

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12/3/2022	ECP	Meet with Receiver regarding information gleaned in meetings, personal property recovery options and values, engagement real estate professionals.	0.90	500.00	450.00
12/3/2022	ECP	Discussions with HOA representatives, resort management, and unit owners.	0.90	500.00	450.00
12/3/2022	JAL	Review summarize of Belize interviews and visit from E. Johnson (.2): draft memo to team on Allegiant, Life Settlements, alcohol and R. Dean request for funds and review background information (1.8); and conference with E. Johnson to address Belize property findings and Issues (.6).	2.60	500.00	1,300.00
12/4/2022	ECP	Meet with M. Dahlquist and E. Johnson regarding recap and management issues related to real property going forward.	0.40	500.00	200.00
12/4/2022	ECP	Discussions with Receiver regarding next steps in accounting and asset administrations and related discussion with J Haupt, HOA representative regarding water treatment facility ownership.	0.40	500.00	200.00
12/4/2022	ECP	Recovery of Polaris vehicle and related email correspondences.	0.50	500.00	250.00
12/4/2022	JAL	Review summaries of Belize visit, discussions, interviews and assets from E. Johnson and E. Peterson.	0.30	500.00	150.00
12/5/2022	AMC	Inventory contents of 1016 Summerchase property.	1.50	470.00	705.00
12/5/2022	ECP	Debrief team regarding Belize property and related events and team conference call.	0.90	500.00	450.00
12/5/2022	ECP	Correspondence with state and federal representatives regarding Belize trip and related matters.	0.30	500.00	150.00
12/5/2022	ECP	Attention to securing possession of Sea Ray boat and related correspondence.	0.40	500.00	200.00
12/5/2022	ECP	Correspondence regarding Belize personal property, values and costs of recovering the same.	0.40	500.00	200.00
12/5/2022	ECP	Correspondence with various persons located in Belize regarding real and personal property matters and related internal correspondence regarding the same.	1.50	500.00	750.00
12/5/2022	EML	Attention to updates from Receiver, E. Johnson regarding assets in Belize and attorney, P. Riggs regarding document collections and preservations [.2]; follow up with Bank of America regarding meeting on funds on hold and request for additional information as to accounts [.1]; follow up with counsel for Kanza Bank regarding list of accounts and EINs for account holders and funds on hold [.1]; review bank account balances [.1].	0.50	395.00	197.50
12/5/2022	JAL	Correspondence regarding Belize property issues [.2], and follow up with attorney, V. Aiello regarding alcohol in Nevada [.1].	0.30	500.00	150.00
12/6/2022	ECP	Attention to location of contact information for witness related to Belize property and correspondence with Saunders, Ford.	0.60	500.00	300.00
12/6/2022	EML	Correspondence with Kanza Bank counsel regarding details as to frozen accounts and request for the same.	0.10	395.00	39.50
12/6/2022	EML	Conference with attorney, P. Riggs regarding preservation notice form and questions as to procedures for mailing and updates to letter [.8]; follow up conference with Receiver, E. Johnson for approval of the same and edit letter [.1]; send list of potential custodians for additional conflicts checks [.2].	1.10	395.00	434.50
12/6/2022	EML	Document Preservation Notices: Finalize document preservation notice form and merge the same; review 65 letters for edits, finalize notices for mailing via USPS.	4.90	395.00	1,935.50
12/6/2022	EML	Document preservation notices to counsel for Kanza Bank and Bank of America as well as Carson Bank, Valley State Bank; correspondence internally regarding preservation notice to counsel for Simmons Bank.	0.40	395.00	158.00
12/6/2022	EML	Correspondence with counsel for Bank of America regarding EIN information as to accounts and meeting to discuss turnover.	0.50	395.00	197.50
12/6/2022	EML		0.20	395.00	79.00

#### Premier Global Corporation, et al. Asset Analysis and Recovery

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12/6/2022	EML	Correspondence with Bank of America regarding accounts on hold and further identifying information [.1]; download and save production [.2]; review letter from Bank of America with requested information [.1]; and follow up with Receiver, E. Johnson regarding the same and instructions for turnover as to certain accounts [.1].	0.50	395.00	197.50
12/6/2022 12/6/2022	FAM KJ	Prepare excel spreadsheet of the inventory of the Parish residence.  Prepare for mailing and mail document preservation letters to initial custodian list and/or counsel for the same via USPS.	1.00 3.90	150.00 150.00	150.00 585.00
12/6/2022	PLR	Telephone call with E. Lally regarding document preservation letters [.6]; telephone calls with Dynatec regarding security camera installation [.2]; communications regarding review of bank records and storage protocol of same [.3]; work on review of materials from Premier office and protocol for uploading and scanning same [1.5]; correspond with L. Parish regarding security camera install [.2] and follow up with A. Chase regarding security camera install [.2]	3.00	500.00	1,500.00
12/7/2022	ECP	Attention to title review, document review, and telephone calls and emails regarding location, possession, maintenance and sale of real and personal property assets including vehicles, and location and communications with persons with knowledge or potential knowledge of estate asset locations.	1.70	500.00	850.00
12/7/2022	EML	Correspondence regarding production of account records for accounts on hold from Bank of America with attorney, P. Riggs and team regarding saving to Relativity. and review of the same.	0.30	395.00	118.50
12/7/2022	EML	Correspondence with counsel for Kanza Bank confirming receipt of preservation notice and response to the same.	0.10	395.00	39.50
12/7/2022	EML		3.70	395.00	1,461.50
12/7/2022	EML	Correspondence from Craig Bucl regarding document preservation letter and respond to counsel for Bucl regarding the same.	0.20	395.00	79.00
12/7/2022	FAM		0.50	150.00	75.00
12/7/2022	FAM	Continue preparing spreadsheets of inventory of the Parish residence; receive 163 photos from A. Chase of inventory at the Parish residence.	1.50	150.00	225.00
12/7/2022	JAL		0.80	500.00	400.00
12/7/2022	ки	Further preparation for mailing and mail document preservation letters to amended custodian list and/or counsel for the same via USPS.	1.20	150.00	180.00
12/7/2022	PLR	Oversee security camera installation.	4.00	500.00	2,000.00
12/8/2022	PLR	Internal communications pertaining to database set up and initial review of computer and iPhone data.	0.40	500.00	200.00
12/9/2022	EML		0.50	395.00	197.50
12/9/2022	EML	Meeting with counsel for Bank of America regarding review of records produced to date, and follow up items as to continued hold on accounts as well as accounts to be turned over and next steps for turnover of funds.	0.40	395.00	158.00
12/9/2022	EML	- "	0.50	395.00	197.50
12/9/2022	EML	Correspondence with attorney for Elkins & Associates and Clyde Edward Elkins regarding document preservation letters.	0.10	395.00	39.50
12/9/2022	ENR	Review Premier related documents for outstanding invoices, accounts receivable, and related documents.	1.50	320.00	480.00
12/9/2022	ПD	Review Premier related documents for determination of as to those to be scanned for immediate review regarding initial case items / tasks.	2.00	320.00	640.00

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12/9/2022	PLR	Call with E Lally regarding bank records (.5); meeting with Bank of America lawyers and E. Lally regarding turnover of funds and records (.5).	1.00	500.00	500.00
12/9/2022	PLR	Review of premier records for determination of potential A/R information (2.0); call with C. Hughes to ask for assistance in interpreting certain materials (.5).	2.50	500.00	1,250.00
12/10/2022	EML	Correspondence confirming receipt of preservation letter to Robert Parish and follow up as to similar letter to Brad Parish.	0.20	395.00	79.00
12/11/2022	PLR	Work on additional preservation notice to Brad Parish.	0.20	500.00	100.00
12/12/2022	ECP	Correspondence regarding lagoon side property, status of title, and unpaid	0.30	500.00	150.00
		construction costs.			
12/12/2022	EML	Correspondence with Landlords Maintenance and Supply, LLC regarding document preservation letter.	0.20	395.00	79.00
12/12/2022	EML	Correspondence with Stretto regarding turnover / payment instructions for Premier Global Corp., receivership account for Bank of America.	0.20	395.00	79.00
12/12/2022	EML	Correspondence with counsel for Kanza Bank regarding summary of accounts on	0.40	395.00	158.00
,,		hold [.1] and review the same and make notes as to receivership accounts to open			
		to accept funds and questions as to various accounts listed on summary [.3].			
12/12/2022	EML	Correspondence regarding attempts to secure property manager for Parish family home and status of the same.	0.20	395.00	79.00
12/12/2022	EML	Correspondence as to potential identification of funds into and out of Belize and	0.10	395.00	39.50
		timing and means of the same, and discussion with Oklahoma securities			
		department.			
12/12/2022	<b>EML</b>	Continued review of Bank of America's initial production of records related to	0.30	395.00	118.50
		accounts on hold, summary of the same as to account holders and signers as well as			
		other relevant information and pull background information, where available, as to			
		entities.			
12/12/2022	<b>EML</b>	Attention to case status and assignment updates, progress of asset preservation and	1.50	395.00	592.50
		dispositions, progress of recovery of account funds from banks and review of bank			
		records, next round of preservation letters, insurance issues and weekly			
		assignments.			
12/12/2022	JAL	Meet with Oklahoma representatives to address life settlement issues and review	1.20	500.00	600.00
		background information and prepare prior to same.			
12/12/2022	PLR	Follow up on document scanning for life insurance information (.1); attention to	1.50	500.00	750.00
		obtaining administrator access to Premier email accounts (.4); work on information			
		sharing agreement (1.0).		477.00	
12/13/2022	AMC	Attention to preservation of records, including communications with R. Frye	0.50	470.00	235.00
		regarding Microsoft preservation and Quickbooks.		E00.00	450.00
12/13/2022	ECP	Attention to correspondence concerning conversion of stadium tickets.	0.30	500.00	150.00
12/13/2022	ECP	Correspondence regarding budget for Belize properties, gather budget information,	1.20	500.00	600.00
		correspondence with unit sale counterparts and attention to unpaid unit expenses, installment payments to or from receivership estate and related correspondence			
		with real estate professionals in Belize.			
12/12/2022	CAAI	Correspondence with B. Parish and ESI team regarding Premier's Microsoft 365	0.20	395.00	79.00
12/13/2022	EIVIL	accounts and access to the same.	0.20	333,00	75.00
12/13/2022	ENID	Continue review and organization of boxes containing Premier documents for	1.80	320.00	576.00
12/13/2022	LIVIT	outstanding invoices, accounts receivable, and related documents.	2100	320.00	370.00
		outstanding involces, accounts receivable, and related documents.			
12/13/2022	FAM	Correspondence with attorney, J. Lodoen regarding check for Bentley storage and	0.10	150.00	15.00
24/20/4044	, , , , , , ,	forwarding to V. Aiello.			
12/13/2022	FAM	Correspondence with attorney, E. Peterson regarding check needed for Puerto Units	0.10	150.00	15.00
		in Belize,	200 105	8 4 5 7 7	
12/13/2022	FAM	Obtain inventory notes from A. Chase and add to spreadsheet of household items at	0.50	150.00	75.00
		the Derby residence.			
		-			

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12/13/2022	JAL	Continue exploring ticket sale options through Suite Hop and Suite experience and review of web pages (.3); call with Suite Hop representative and prepare initial form to begin listing process (.2); two calls with Raider's stadium representatives regarding status of suite and tickets (.5); e-mail to Raiders directing closing ticket account (.2); e-mail to Suite Hop demanding holding of cash and inquiring regarding selling of tickets (.4); prepare summary for internal team regarding ticket status (.3); internet search regarding ticket assignees (.3); call with E. Johnson regarding same (.2); call with V. Aiello to discuss car storage fee (.2).	2.60	500.00	1,300.00
12/13/2022	PLR	Telephone call with E. Lally to discuss bank preservation and fund turnover issues (.4); communications pertaining to email account access and managing data (.4).	0.80	500.00	400.00
12/14/2022	AMC	Review of Premier Global emails to find information regarding Raiders tickets.	0.30	470.00	141.00
12/14/2022	ЕСР	Correspondence with Jeff Bella and Emil Arguellas, and related correspondences with Mary Dahlquist and Jodi Haupt, regarding X'Tan Ha sales plan, budget, and title and other documents required for sale of resort units under Belize law.	0.90	500.00	450.00
12/14/2022	ECP	Attention to access to Parish emails, sale of stadium tickets without permission, and related matters.	0.40	500.00	200.00
12/14/2022	JAL	Correspondence with attorneys for Kansas and Oklahoma departments of securities regarding Raiders suite and follow-up questions regarding same.	0.40	500.00	200.00
12/15/2022	AMC	Attention to Ticketmaster issues, including coordinating response to Ticketmaster regarding Raiders tickets.	0.40	470.00	188.00
12/15/2022	EML	Various correspondence regarding access to Steven Parish's email account and transfers of Raiders tickets.	0.60	395.00	237.00
12/15/2022	EML	Correspondence as to addresses for Parish family members for equipment turnover letters.	0.10	395.00	39.50
12/15/2022	EML	Correspondence and follow up with Receiver regarding turnover / payment instructions for Bank of America funds.	0.10	395.00	39.50
12/15/2022	JAL	Correspondence with attorney, A. Chase regarding Raiders suite and Ticketmaster (.2); follow up with attorney, P. Riggs regarding notices to ticket brokers and purchasers (.5); correspondence regarding Bentley storage (.1); and call with E. Johnson regarding tickets (.1).	0.90	500.00	450.00
12/15/2022	JRP	Correspondence with Towbin Motors re pickup of Bentley.	0.20	75.00	15.00
12/16/2022	EML	Correspondence with Receiver and follow up with Bank of America regarding payment instructions for turnover of main Premier Global Corporation account funds.	0.20	395.00	79.00
12/16/2022	EML	Prepare list of accounts at Bank of America and Kanza Bank with funds to be turnover for receivership entities, account numbers, EIN numbers, balances for opening Receivership accounts to accept funds and send to Receiver.	0.70	395.00	276.50
12/16/2022	JAL	Conference with E. Peterson to discuss various issues pertinent to Belize and monetizing the assets there (.5); participate in call with J. Carley and P. Riggs regarding Raiders suite (.5); conference and follow up correspondence with P. Riggs to prepare for call (.4); review and revise letter to J. Carley (.4); draft and revise letter to Mr. Fagundes (.8); internet research regarding tickets (.3).	2.90	500.00	1,450.00
12/16/2022	PLR	Work on access to Raiders tickets and elimination of prior access credentials (2.0); draft demand letter to Ticketmaster (1.5); draft demand letter to Raiders (1.5); telephone calls with J. Carley, general counsel of Raiders, and J. Lodoen regarding locking down of account (.8).	5.80	500.00	2,900.00
12/16/2022	ТВ	Review and analyze Premier related email accounts to identify ticket transfer correspondence and other items requested by case team, and send update to attorney, A. Chase.	0.80	240.00	192.00
12/18/2022	JAL	Attention to open case status items and check on asset status and action items.	1.30	500.00	650.00

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12/19/2022	AMC	Correspondence with Receiver regarding vehicle insurance options (.2); follow up correspondence with insurance company regarding estimate for vehicle coverage (.3); phone call with R. Frye regarding status of Quickbooks preservation (.1); follow up on status of title work (.1); e-mail correspondence with Kraken regarding additional information requested for Kraken to search for accounts (.2).	0.90	470.00	423.00
12/19/2022	AMC	E-mail correspondence with L. Parish regarding Lexus lease (.1); review S. Parish emails to find records regarding Lexus lease (.3).	0.40	470.00	188.00
12/19/2022	EML		0.70	395.00	276.50
12/19/2022	EML	N915TF Leasing LLC: correspondence with counsel for Mr. Murfin / Tallgrass Aviation Associates LLC regarding document preservation letter, review ownership issues and Secretary of State information and respond to the same.	0.40	395.00	158.00
12/19/2022	EML	Correspondence with Receiver regarding initial turnover request to Kanza Bank and questions as to certain accounts.	0.20	395.00	79.00
12/19/2022	EML		0.20	395.00	79.00
12/19/2022	JAL	Review e-mails regarding Allegiant stadium (.2).	0.20	500.00	100.00
12/19/2022	JAL	e-mail with Oklahoma and Kansas regarding life policies meeting (.2).	0.20	500.00	100.00
12/19/2022	JAL	Weekly meeting to address asset recovery and management action item list (1.5).	1.50	500.00	750.00
12/19/2022	JRP	Attention to issues regarding towing and storage of Bentley.	0.20	75.00	15.00
12/19/2022	ЦD	Draft letters to various former employees requesting turnover of technology and documents pertaining to the estate.	0.90	320.00	288.00
12/19/2022	ПD	Coordinate with representative at Intrust Arena to determine status of lease of Suite (.4); and follow up correspondence summarizing the receivership order and listing open questions [.1]	0.50	320.00	160.00
12/19/2022	PLR	Conference with C. Hughes regarding information on a life insurance entity (.2); review Premier email account for information about KC Chiefs tickets (.5); internal communications regarding database (.2).	0.90	500.00	450.00
12/20/2022	AMC	Review tax records on 1016 Summer Chase and correspondence with Receiver, E.  Johnson regarding the same for information for report.	0.30	470.00	141.00
12/20/2022	AMC	Analyze ownership of life insurance policies (.3); e-mail correspondence with E. Johnson regarding the same (.1).	0.40	470.00	188.00
12/20/2022	AMC	Attention to restoring Quickbooks access to companies that were canceled prior to receivership appointment.	0.40	470.00	188.00
12/20/2022	ECP	Email correspondence regarding Bentley retrieval.	0.10	500.00	50.00
12/20/2022		Follow up correspondence and call with counsel for Bank of America regarding partial turnover of funds on hold and instructions for the same.	0.40	395.00	158.00
12/20/2022	PLR	Correspondence pertaining to adding an additional receivership entity (.2); correspondence pertaining to potential subpoena to Tallgrass (.2).	0.40	500.00	200.00
12/21/2022	EML	Attention to questions regarding various LLCs with assets listed in Quickbooks in advance of meeting with Kansas and Oklahoma securities departments and responses to the same.	0.20	395.00	79.00
12/21/2022	EML	Continued review of document production from Bank of America related to held accounts and summary of information related to the same, potential parties and assets.	1.30	395.00	513.50
12/21/2022	HSA		0.20	500.00	100.00
12/21/2022	JAL	Review correspondence and policy binders to prepare for call with Oklahoma and Kansas securities departments (2.8); and participate in call with Oklahoma and Kansas to discuss life settlement policies and issues (1.7).	4.50	500.00	2,250.00
12/21/2022	Пр	Review and analyze documents in relativity to find additional information about entities related to life insurance policies including corporate documents and email communications.	3.30	320.00	1,056.00

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12/21/2022	PLR	Internal communications regarding connected entities and obtaining information on the same (.2); communications with team and storage owner regarding confirmation of requested storage of materials (.2); communications with L. Parish regarding outreach on proceeds of Raiders tickets (.2); review and edit certificate of service and notice of operating report (.3); analysis of whether to enforce Microsoft subpoena (.3); draft summary of document review priorities (.4).	1.60	500.00	800.00
12/22/2022 12/22/2022	ECP EML	Follow up with S. Bolanos and attend to Belize phone issue.  Continued review of document production from Bank of America related to held accounts and summary of information related to the same, potential parties and assets.	0.40 3.60	500.00 395.00	200.00 1,422.00
12/22/2022	EML	Continued review of document production from Bank of America related to held accounts and summary of information related to the same, potential parties and assets.	0.40	395.00	158.00
12/22/2022	JRP	Coordinate issues with towing company and Towbin dealership regarding locating car registration and towing / pickup of Bentley.	1.00	75.00	75.00
12/23/2022	AMC	Correspondence with insurance broker regarding storage of vehicles.	0.10	470.00	47.00
12/23/2022		Correspondence with Receiver regarding adding additional receivership entities to the cases based on review of banking information.	0.10	395.00	39.50
12/23/2022	EML	Review Dean's Motions for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses and Legal Fees as well as Information from Kanza Bank as to accounts and correspondence with Receiver regarding the same.	0.30	395.00	118.50
12/23/2022	EML	Review of interstate depositions and discovery act and adoption in Washington State as well as requirements for the same in Washington State and King County, and correspondence and summary of the same regarding service on Microsoft.	0.50	395.00	197.50
12/23/2022	JAL	Review background information on Shah policy and other life settlement investments (1.3); participate in call with counsel for Mr. Dean, Oklahoma and Kansas regarding information on life settlements (1.5); follow-up call with E. Johnson and Kansas and Oklahoma departments to address issues (1.5); e-mail and review information from Mr. Zabrochi (.2); call with T. Knutzen and J. Zabrochi (.8); follow up with E. Johnson regarding the same (.3).	5.60	500.00	2,800.00
12/24/2022	EML	Correspondence regarding life settlement accounts and accounts on hold with Kanza Bank regarding Dean's motion for relief regarding accounts at bank and responses to the same.	0.30	395.00	118.50
12/26/2022	EML	Prepare update as to bank turnover issues, status of matters assigned and review of receivership bank accounts for status of Bank of America turnover.	0.30	395.00	118.50
12/26/2022	JAL	Prepare summary of life insurance policies and options regarding Shah life insurance and North Arlington (.9); review correspondence and a related documents from J. Zabrocki regarding policy payments, premiums, sharing and related matters and forward same with e-mail (.6); e-mail from M. Talbert regarding pending litigation (.2).	0.20	500.00	100.00
12/26/2022	JAL	and the state of	1.50	500.00	750.00
12/27/2022	ECP	Attention to crypto liquidation letter.	0.10	500.00	50.00
12/27/2022	EML	Correspondence regarding Shah - Genworth life settlement agreements.	0.30	395.00	118.50
12/27/2022		Review information related to Belize unites, photos of units, balances owed on dues and budget.	0.40	395.00	158.00
12/27/2022		Continued review and summary of document production from Bank of America related to held accounts and summary of information related to the same, potential parties and assets.	1.60	395.00	632.00
12/27/2022	EML	Correspondence with counsel for Kanza Bank regarding turnover of funds in accounts clearly held in name of Receivership Entitles.	0.10	395.00	39.50

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Hours: 168.00 Amount: 73,862.00

12/27/2022	EML	Correspondence regarding research into various life insurance policies for named insureds, review assets reports for KCI Business Services and DDI Advisory Group.	0.40	395.00	158.00
12/27/2022	EML	Attention to case status issues and weekly assignments.	1.00	395.00	395.00
12/27/2022	JAL	Participate in weekly status meeting as to open items and asset recovery issues.	0.50	500.00	250.00
12/27/2022	JAL	Review e-mail from J. Timmons regarding bounced check and frozen funds including forwarding same to P. Labarthe and reviewing response from her.	0.20	500.00	100.00
12/27/2022	ΠD	Review and analyze index created during packing project to determine whether boxes were correctly sent to the caves storage unit and correspondence with attorney, P. Riggs summarizing the same.	0.30	320.00	96.00
12/27/2022	ND	Correspondence with Intrust Arena following up about questions regarding the contract for the suite.	0.10	320.00	32.00
12/27/2022	ЦD	Coordinate background investigation on two individuals related to the life insurance policy research.	0.10	320.00	32.00
12/27/2022	PLR	Follow up Raiders counsel regarding liquidation of tickets.	0.10	500.00	50.00
12/27/2022	PLR	Correspond with landlord regarding resolution of outstanding balance (.2); edit	1.10	500.00	550.00
		common interest agreement and re-circulate to counsel (.5); follow up on interview of L. Parish (.1); and correspondence with H. Allen in regards to Microsoft subpoena issue (.3)			
12/28/2022	ECP	Correspondence with M. Coleman regarding lagoon side property.	0.40	500.00	200.00
12/28/2022	ECP	Correspondence regarding interview with L. Parish.	0.10	500.00	50.00
12/28/2022	ECP	Correspondence with potential witness regarding Belize property.	0.10	500.00	50.00
12/28/2022	ECP	Revised proposed budget related to preservation of Belize assets prior to sale.	0.50	500.00	250.00
12/28/2022	EML	Conference with counsel for Kanza Bank regarding turnover request and Motion by Mr. Dean related to other accounts at bank and follow up with Receiver regarding the same.	0.60	395.00	237.00
12/28/2022	EML	Attention to issues regarding access of Microsoft accounts and subpoena regarding the same.	0.10	395.00	39.50
12/28/2022	PLR	Communications in regards to scheduling L. Parish interview.	0.20	500.00	100.00
12/29/2022	EML	Continued review and summary of document production from Bank of America related to held accounts and summary of information related to the same, potential parties and assets and correspondence with Receiver regarding investigation in to certain account signatories.	3.90	395.00	1,540.50
12/29/2022	JAL	Numerous correspondence with Oklahoma and Kansas, and from Mr. Dean's counsel to address Life Settlement accounts and related matters (2.1); and follow up with E. Johnson regarding the same (.2).	2.30	500.00	1,150.00
12/29/2022	PLR	Correspond with Oklahoma and Kansas departments of securities regarding common interest agreement and account records pertaining to certain LLCs (.3);	0.10	500.00	50.00
12/29/2022	PLR	internal communications regarding Raiders tickets (.1).  Correspondence with Oklahoma and Kansas departments of securities regarding common interest agreement (.2) and account records pertaining to certain LLCs (.3).	0.50	500.00	250.00
12/30/2022	EML	Finish review and summary of document production from Bank of America related to held accounts and summary of information related to the same.	1.20	395.00	474.00
12/30/2022	EML	Correspondence with Bank of America's counsel regarding turnover instructions for accounts to be turned over via check and instructions for the same.	0.20	395.00	79.00

#### Premier Global Corporation, et al. Asset Disposition

Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/1/2022	JAL	Conference with counsel for Mr. Dean and related entities to discuss life settlement matters.	0.90	500.00	450.00
12/2/2022	VJA	Follow up correspondence and discussions on Bentley and condo property turn over.	0.40	500.00	200.00
12/5/2022	VJA	Correspondence regarding disposing of Parrish alcohol given licensing issues.	0.30	500.00	150.00
12/6/2022	EML	Correspondence regarding potential property manager for Parish family home and respond to the same [.1]; being research; query to Cedar Mills property management company [.3].	0.40	395.00	158.00
12/12/2022	VJA	Follow up correspondence and call concerning the box suite Raiders tickets and potential sale of tickets.	0.80	500.00	400.00
12/13/2022	ECP	Team call and report on status of Belize property sales.	1.40	500.00	700.00
12/13/2022	VJA	Correspondence on Raiders suite tickets and conference with J. Lodoen on additional options with ticket sales.	0.30	500.00	150.00
12/16/2022	ECP	Correspondence with Belize persons regarding property and administrations and preservations of the same including with Jeff Bella concerning plan to market and sell resort units and other parcels.	1.60	500.00	800.00
12/19/2022	AMC	Correspondence and conference with Purple Wave regarding auction for vehicles (.4); and follow up with Receiver regarding the same (.2).	0.60	470.00	282.00
12/19/2022	VJA	Attention to issues regarding Bentley towing and storage issues.	0.80	500.00	400.00
12/20/2022	ECP	Follow up with J. Bella regarding real estate sales and related document request.	0.90	500.00	450.00
12/20/2022	ПD	Draft sales procedure order	2.40	320.00	768.00
12/20/2022	VJA	Continued follow up on Bentley towing and storage. Note mechanical issues and provide an update to Receiver.	0.70	500.00	350.00
12/22/2022	VJA	Work with towing company on towing and long term storage options for vehicle.	0.40	500.00	200.00
12/23/2022	EML	Correspondence regarding sale of Chiefs and Raider's tickets and follow up with Receiver regarding potential noticing of the same.	0.30	395.00	118.50
12/27/2022	ECP	Correspondence with prospective broker and counsel and others regarding documentation and plan for marketing and sale of resort units.	0.70	500.00	350.00
12/28/2022	ECP	Correspondence with potential broker regarding engagement and related correspondence with Claudio Azueta, Mary Dahlquist, Jodi Haupt regarding sale documents, planning.	0.90	500.00	450.00
12/29/2022	ЦD	Finalize Sale Procedures Order and correspondence with attorney, E. Peterson regarding the same.	0.40	320.00	128.00
12/30/2022	ECP	Review and revise sales procedures motion and related document review.	3.30	500.00	1,650.00
12/30/2022	ECP	Prepare for and participate in call with Claudio Azuelta, Jeff Bella, Emil Arguellas relating to real property sale plan in Belize.	1.20	500.00	600.00
		Hours:	18.70	Amount:	8,754.50

#### Premier Global Corporation, et al. Business Operations

12/1/2022 AMC Correspondence with insurance adjuster regarding property inspection (.2); review life insurance policies sent by L. Parish's counce (14); and follow up correspondence with insurance company regarding status of estimate on real property insurance (.1).    12/2/2022 AMC Correspondence with opposing counsel regarding life insurance and other issues (.2); attention to payment of life insurance policy (.1); correspondence with rollent, E. Johnson regarding life insurance payment (.1); correspondence with broker regarding real property insurance (.2); review estimate on real property insurance (.1); e-mail correspondence with E. Johnson regarding real property insurance (.1); e-mail correspondence with insurance (.1); e-mail correspondence with E. Johnson regarding real property insurance (.1); e-mail correspondence with E. Johnson regarding real property insurance (.1); e-mail correspondence with insurance broker regarding same.    12/5/2022 AMC Correspondence with insurance broker regarding estimate for car insurance.	Date	Tkpr	Narrative	Hours	Rate	<b>Bill Amount</b>
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12/30/2022 PLR Correspond with landlord for premier facility regarding account balance. 0.20 500.00 100.00	12/27/2022	ECP	Draft X'Tan Ha administration budget and related calls and emails with M. Dahlquist,	3.30	500.00	1,650.00
			J. Haupt and others.			
Hours: 15.10 Amount: 6,437.50	12/30/2022	PLR		0.20	500.00	
			Hours:	15.10	Amount:	6,437.50

#### Premier Global Corporation, et al. Case Administration

Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/1/2022	ECP	Prepare for and participate in group status call.	1.30	500.00	650.00
12/4/2022	PLR	Draft status update in advance of team meeting (.5); correspondence with P. Ozias regarding database instructions (.2).	0.70	500.00	350.00
12/5/2022	EML	Case status conference with Receiver, E. Johnson and team regarding open items and work assignments for the week.	1.50	395.00	592.50
12/5/2022	FAM	Attention to issues regarding various mail and postage issues in Derby, Kansas, go to US Post Office to try and get in the post office box; meet with L. Parish's brother to get key to post office box; and; go to US Post Office to try and get in the post office box.	2.00	150.00	300.00
12/5/2022	JAL	Participate in weekly call of team to update on Belize and address action item list.	1.50	500.00	750.00
12/5/2022	PLR	Meeting with Receiver and team as to weekly case assignments and status update [1.6] and follow communications as to strategy regarding Belize issues [1.0].	2.60	500.00	1,300.00
12/5/2022	PSO	Work with Litigation Support and Modus e-discovery regarding set-up in discovery database for Premier Global documents.	0.20	175.00	35.00
12/6/2022	AMC	Review and analyze forwarded mail (1.4); phone call with Missouri securities division regarding correspondence to company and receivership (.1).	1.50	470.00	705.00
12/6/2022	EML	Submitted updated conflicts request based on research into ownership of defendants and other related entities and parties.	1.20	395.00	474.00
12/6/2022	FAM	Correspondence with attorney, P. Riggs regarding change of address forms for Vegas property [.2] and regarding security code to Parish residence [.1].	0.30	150.00	45.00
12/7/2022	FAM	Attention to and file various bank statements for month related to receivership entities.	0.50	150.00	75.00
12/7/2022	PSO	Continued work on setting up documents for loading to discovery database, including third party documents from Bank of America and client documents; provide instructions to Litigation Support and Modus e-discovery regarding same.	2.30	175.00	402.50
12/8/2022	PSO	Finalize organization of all documents for transfer to Modus E-Discovery; prepare and send detailed email to Modus regarding set up of discovery database and transfer of all documents.	1.00	175.00	175.00
12/12/2022	JAL	Weekly update meeting with team to address action items on topic list.	1.50	500.00	750.00
12/12/2022	PLR	Prepare for and attend team status meeting.	1.80	500.00	900.00
12/13/2022		Create financial files for paid invoices that are on E. Johnson's credit cards [.5]; create	1.20	150.00	180.00
12/13/2022	IAW	a master contact list and circulate to team [.5]; correspondence regarding photos from Derby residence /inventory [.2].	2.40	2000	100100
12/14/2022	FAM	Telephone call from T. Paylo (investor) in the PF-6 entity wanting a status update and follow up with to E. Johnson regarding same.	0.30	150.00	45.00
12/14/2022	FAM	Meeting with E. Johnson regarding information required for all check requests from team and follow up with team regarding filling out check request information and details as to the same.	0.40	150.00	60.00
12/14/2022	PLR	Work on access to S. Parish email account (.3); work on review of S. Parish emails (2.2).	2.50	500.00	1,250.00
12/14/2022	PSO	Organize additional hard copy documents and meet with copy vendor to provide detailed instructions regarding scanning of same, and upcoming scanning work, for loading of documents to Relativity database.	1.20	175.00	210.00
12/15/2022	PLR	Telephone call with P. Ozias regarding handling of data for relativity (.2); internal communications regarding loading of data (.3).	0.50	500.00	250.00
12/16/2022	EML	Review and revise monthly operating report for November 2022.	0.20	395.00	79.00
12/16/2022	JAL	Review, revise and supplement sections of draft Receiver report.	0.90	500.00	450.00
12/16/2022	PSO	Organize Steve Parish emails obtained by Mode One and forward to Modus e-	0.30	175.00	52.50
12/10/2022	130	discovery with instructions regarding loading same to the discovery database.	5.50	2,0100	32,30
12/17/2022	EML	Revise November monthly operating report and correspondence as to suggested revisions to the same.	1.30	395.00	513.50
12/17/2022	PŁR	Write update bullet points for monthly report.	0.50	500.00	250.00
12/19/2022	ECP	Conference with team regarding status of pending asset recoveries, liquidations and related issues.	0.80	500.00	400.00

#### Premier Global Corporation, et al. Case Administration

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12/19/2022	EML	Attention to weekly status updates and ongoing case matters concerning assignment of tasks related to bank turnovers and conflicts as well as the preservation and	1.60	395.00	632.00
40 40 10000	010	disposition of assets.	1.80	500.00	900.00
12/19/2022	PLR	Prepare for (.2) and attend (1.6) weekly status meeting.			
12/19/2022	PSO	Continued work with Modus e-discovery regarding loading new client documents for review.	0.30	175.00	52.50
12/20/2022	<b>EML</b>	Review of Form 1, estate property record and report for additional information as to	0.50	395.00	197.50
		assets from Quickbooks and submit updated request for conflicts as to potential companies involved with Receivership Entities.			
12/20/2022	EML	Request as to information regarding accounts held by Mr. Dean, individually, and	0.20	395.00	79.00
,,		summarize the same for Receiver.			
12/20/2022	EML	Attention to addition of potential other receivership entities to Oklahoma and Kansas	0.20	395.00	79.00
•		actions and correspondence as to the same, next steps.			
12/20/2022	EML	Review and revise November Operating Report and correspondence with Receiver	0.20	395.00	79.00
•		regarding the same.			
12/20/2022	EML	Review list of Bank of America account holders / frozen accounts and submit updated	0.40	395.00	158.00
,,		request for conflicts as to potential companies involved with Receivership Entities.			
		,			
12/20/2022	PSO	Work with Litigation Support to develop plan for review of Premier Global documents	0.40	175.00	70.00
,,		and report to P. Riggs regarding same.			
12/22/2022	ECP	Review resort rental pool management agreement.	0.50	500.00	250.00
12/23/2022	EML	Correspondence regarding filing of November operating report in Kansas and	0.20	395.00	79.00
		Oklahoma and attention to service issues regarding the same.			
12/27/2022	ECP	Prepare for and attending case status and update meeting with receivership team.	1.20	500.00	600.00
,,					
12/27/2022	PLR	Prepare for and attend weekly meeting to discuss update of assigned tasks and new	1.00	500.00	500.00
,,		assignments for the week.			
		Hours:	38.50	Amount:	14,920.00

#### Premier Global Corporation, et al. Employment and Fee Applications

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Date	Tkpr	Narrative	Hours	Rate	<b>Bill Amount</b>
12/1/2022	ECP	Prepare for meeting and meeting with prospective counsel in Belize City and related	1.90	500.00	950.00
		discussions with receiver.			
12/19/2022	ECP	Correspondence with J. Bella regarding engagement and real estate administration	0.40	500.00	200.00
		plan.			
12/22/2022	ECP	Email correspondence with potential counsel and real estate broker regarding	0.90	500.00	450.00
		documents and resort unit sales, engagement terms for counsel.			
12/23/2022	ECP	Correspondence with potential Belize counsel.	0.30	500.00	150.00
12/24/2022	ECP	Phone and email correspondence with potential Belize counsel.	1.20	500.00	600.00
12/27/2022	ECP	Correspondence with G. Godfrey, prospective Belize litigation counsel.	0.30	500.00	150.00
12/29/2022	IJD	Begin drafting employment application to employ real estate agent in Belize.	0.20	320.00	64.00
12/30/2022	HSA	Attention to and review docket for any objection to Receiver's monthly fee statement	0.20	500.00	100.00
		and follow up correspondence with client, Eric Johnston regarding the same.			
		Hours:	5.40	Amount:	2,664.00

## Premier Global Corporation, et al. Litigation: Contested Matters and Ancillary Proceedings

Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/1/2022	JAL	Call with M. Hall and S. Mullins to discuss R. Dean budget request (.5); and follow up	1.30	500.00	650.00
		correspondence regarding same and review pleading request and budget (.8).			
12/2/2022	HSA	Review Order Granting Motion of Defendants Deal and DDI's Extension of Time to Answer.	0.10	500.00	50.00
12/5/2022	PLR	Attention to strategy with R. Frye regarding cell phone data [.5]; work on document preservation letter and information sharing agreement with State of Oklahoma and corresponding common interest agreement [3.0]	3.50	500.00	1,750.00
12/7/2022	JAL	Correspondence Oklahoma Dept. of Securities and E. Johnson open matters in Oklahoma action and budget issues.	0.40	500.00	200.00
12/13/2022	PLR	Work on common interest agreement for exchange of information with OK and KS (2.0); call with OK counsel regarding same (.5).	2.50	500.00	1,250.00
12/14/2022	HSA	Attention to correspondence regarding potential witnessed in case.	0.10	500.00	50.00
12/15/2022	PLR	Work on common interest agreement (1.0); work on summary of Raiders tickets based upon email review of S. Parish's email account (2.0); work on letter to Raiders and to ticket broker (1.5).	4.50	500.00	2,250.00
12/16/2022	HSA	Attention to Mr. Dean's Emergency Application to Shorten Time to Respond and for Expedited Hearing on Motions of Defendant Richard Dale Dean for Partial Lifting of Asset Freeze.	0.10	500.00	50.00
12/16/2022	HSA	Review Richard Dean's Emergency Motion for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses	0.10	500.00	50.00
12/16/2022	JRP	Submit appearance request for attorney, Vincent J. Aiello related to 12/28 hearing.	0.10	75.00	7.50
12/19/2022	HSA	Review Defendant Dean's and DDI Advisory Group, LLC's Joinder to Motion to Dismiss Plaintiff's Petition.	0.10	500.00	50.00
12/21/2022	JAL	Review correspondence and policy binders to prepare for call with Oklahoma and Kansas securities departments (2.8); review response to defendants' motion for expedited hearing (.3); participate in call with Oklahoma and Kansas to discuss life settlement policies and issues (1.7).	0.30	500.00	150.00
12/22/2022	JAL	Call with counsel for Oklahoma Securities Department to discuss proposal to R. Dean counsel related to asset freeze (.2); follow-up correspondence with Mr. Dean's counsel regarding motion and policies (.2); review motion related to partial lift of freeze (.3); correspondence with T. Knutzen regarding proposal (.2); and follow up with Oklahoma Securities Dept. regarding successor manager (.2).	1.10	500.00	550,00
12/23/2022	HSA	Review Plaintiff's Objection to Emergency Application to Shorten Time to Respond and for Expedited Hearing on Motions of Defendant Dean for Partial Lifting of Asset Freeze.	0.20	500.00	100.00
12/26/2022	JAL	Review draft motion and order from Kansas regarding unfreezing of accounts and provide suggested revisions regarding same (.8); follow-up e-mails regarding same (.2); review multiple e-mails regarding same (2.).	1.20	500.00	600.00
12/26/2022	JAL	Correspondence from counsel for Mr. Dean regarding funds in account and related litigation (.2); review budget deliverables and review prior e-mails and motion regarding budget and related legal arguments (.6).	0.80	500.00	400.00
12/27/2022	HSA	and the state of t	0.20	500.00	100.00
12/27/2022	JAL	Prepare draft correspondence / proposal for Mr. Dean and related entities addressing attorney fees request and living expenses (2.3); correspondence with E. Johnson regarding the same (.2); follow up correspondences with counsel for Mr. Dean and Kansas and Oklahoma departments of securities regarding same (.3).	2.80	500.00	1,400.00
12/27/2022 12/28/2022	PLR HSA	Review and comment on KS motion to partially lift asset freeze.  Review email from Bruce Day, attorney for Dean entities, re: Motion and Order for Partial Lift of Asset Freeze regarding Life Settlements and a potential agreement between the Dept. of Securities and Dean's lawyers for some concessions regarding the same	0.50 0.10	500.00 500.00	250.00 50.00
12/28/2022	HAS	Review correspondence between counsel for Dept of Securities, Patty Labarthe and counsel for Defendant Dean entities, Molly Tolbert, re: Motion and Order for Partial Lift of Asset Freeze Regarding Life Settlements	0.10	500.00	50.00

## Premier Global Corporation, et al. Litigation: Contested Matters and Ancillary Proceedings

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12/28/2022	JAL	Review and comment on draft of term sheet to cause R. Dean transfer of funds and consideration of budget and attorney fee issues (.5); numerous e-mails with his counsel and Kansas and Oklahoma departments regarding same and treat of Life Settlement entities and funds (.6); review comments to drafts of related motions (.4).		500.00	750.00
12/28/2022	LKW	Appearance at hearing for Nevada receivership. Follow up email with Receiver E. Johnson to report on court proceedings.	0.50	365.00	182.50
12/28/2022	VJA	Attention to strategy regarding scope and nature of hearing on order appointing Nevada receiver and order as to the same.	0.70	500.00	350.00
12/29/2022	HSA	Attention to Agreed Order and compare to Motion for Dean Partial Lift of Asset Freeze to execute Order.	0.20	500.00	100.00
12/29/2022	HSA	Review Emergency Motion to Partially Lift Asset Freeze as to Certain Bank Accounts at Kanza Bank filed by the Oklahoma Dept. of Securities.	0.10	500.00	50.00
12/30/2022	HSA	Review, sign and send Agreed Order with signature to counsel for Oklahoma Dept. of Securities.	0.20	500.00	100.00
12/30/2022	HSA	Finalize and file Certificate of No Objection to Receiver's Monthly Billing (November 2022) and Receiver's Response and Reservation of Rights to (1) Defendants' Emergency Motion to Release Frozen Assets for Living Expenses and (2) Motion of Defendant Richard Dale Dean for Partial Lifting of Asset Freeze to Permit Payment of Legal Fees	0.20	500.00	100.00
12/30/2022	HSA	Review Plaintiff's Objection to Emergency Motions of Defendant Dean for Partial Lifting of Asset Freeze to Permit Payment of Living Expenses and Legal Fees.	0.10	500.00	50.00
12/30/2022	HSA	Finalize and file Certificate of No Objection to Receiver's Monthly Billing (November 2022) and Receiver's Response and Reservation of Rights to (1) Defendants' Emergency Motion to Release Frozen Assets for Living Expenses and (2) Motion of Defendant Richard Dale Dean for Partial Lifting of Asset Freeze to Permit Payment of Legal Fees	0.50	500.00	250.00
12/30/2022	JAL	Conference all with E. Johnson and Oklahoma and Kansas departments to discuss pending motions, response and proposal to reach resolution as to contested motion concerning partial lift of assets freeze (1.0); work on responsive pleadings (.6); review and comment on Oklahoma response (.6); review and revise Receiver response (.8); follow up correspondence regarding same (.2).	3.20	500.00	1,600.00
12/30/2022	ND	Draft response to Mr. Dean's motion to unfreeze certain assets and revise and incorporate comments and edits from E. Johnson and J. Lodoen regarding the same.	4.10	320.00	1,312.00
12/31/2022	HSA	Correspondence with attorney for Oklahoma Dept. of Securities regarding upcoming hearing and ability of Receiver to attend remotely.	0.10	500.00	50.00
		Hours:	31.50	Amount:	14,902.00

#### Premier Global Corporation, et al.

Tax

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Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/21/2022	AMC	Review and analyze records to provide to estate accountant (1.0); e-mail	1.20	470.00	564.00
		correspondence with estate accountant regarding tax return information (.2).			

Hours:

1.20 Amount:

564.00

#### Premier Global Corporation, et al. Non-Working Travel

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Date	Tkpr	Narrative	Hours	Rate	Bill Amount
12/1/2022	ECP	Travel to Belize airport, flight to Ambergris Caye, travel to resort property.	1.70	250.00	425.00
12/4/2022	AMC	Non-working travel time to Wichita.	3.00	235.00	705.00
12/4/2022	ECP	Travel Ambergris Caye to Belize City.	1.80	250.00	450.00
12/4/2022	ECP	Travel Belize to Houston, TX.	5.20	250.00	1,300.00
12/4/2022	ECP	Travel Houston TX to St Louis.	7.00	250.00	1,750.00
12/4/2022	FAM	Travel to Wichita for inventory of the Parish residence with A. Chase.	3.00	75.00	225.00
12/5/2022	AMC	Non-working travel time.	3.50	235.00	822.50
12/5/2022	FAM	Travel in and around Derby, Kansas from Derby, Kansas with A. Chase to inventory	3.50	75.00	262.50
		the Parish residence [.5] and travel back to Kansas City [3.0].			
12/7/2022	PLR	Travel to Wichita for security camera installation (3.0); return travel to Kansas City	6.00	250.00	1,500.00
		(3.0).			
		Hours:	34.70	Amount:	7,440.00

### Premier Global Corporation, et al. Disbursements

Category	Date	Bill Amount	Description
E-Discovery			
	11/30/2022	10,552.50	ModeOne Technologies, Inc.: E-Discovery Month of November 2022
	Total	10,552.50	
Federal Express			
	12/7/2022	15.84	Federal Express (Delivery of Lexus Registration Related Documents to Lori Parish)
	12/14/2022	23.89	Federal Express (Delivery of Payments to Sandy Point Resorts re X'Tan Ha Payments)
	12/21/2022	24.25	Federal Express (Delivery of payment to Cynthia Puerto re X'Tan HA installment Payment)
	12/21/2022	16.88	Federal Express (Payment of monthly insurance Involce to Trustee Insurance Agency Inc)
	12/21/2022	11.66	Federal Express (Payment of Mr. Handyman Bill related to repairs of Summerchase Property)
	12/21/2022	19.60	Federal Express (Documents to Las Vegas Office)
	12/21/2022	107.57	Federal Express (Letters related to Ongoing Use of Allegient Suite Tickets)
	Total	219.69	
Lodging			
	12/4/2022	220.32	X-Tan Ha (ELI - 3 Nights)
	12/5/2022	206.00	Wichita Marriott (AMC/FM- 2 rooms, 1 night @ 103 GSA Lodge Rate)
	Total	426.32	
Meals			
	11/16/2022	0.00	MERCHANT: Buffalo Wild Wings, Date: 11/16/2022
	12/4/2022	524.34	X'Tan Ha Meal Expense (12-1 through 12-4)
	12/4/2022	0.00	MERCHANT: House of Maya, Date: 12/4/2022
	12/4/2022	58.00	ELI/ECP 12-4-22 Dinner Expense (@ \$29 GSA Meal Rate)
	12/7/2022	9.94	PLR 12/7/2022 Lunch Expense
	Total	592.28	
Mileage/Travel			
	12/7/2022	240.00	PLR Mileage related to 12/7/2022 Derby, Kansas Tríp
	Total	240.00	
Miscellaneous			
	11/29/2022	10.45	Change of Agent Expense
	12/4/2022	4,763.72	Quickbooks Expense
	12/4/2022	1,927.18	United of Omaha Insurance Payment
	12/16/2022	1,091.30	Progressive Insurance - auto insurance
		7,792.65	
	Total Expenses	19,823.44	





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